

The Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D. et al., on behalf of a class of those
similarly situated,

Plaintiffs,

v.

CHRIS REYKDAL, in his capacity as the
SUPERINTENDENT OF PUBLIC
INSTRUCTION and OFFICE OF THE
SUPERINTENDENT OF PUBLIC
INSTRUCTION, a Washington State agency,

Defendants.

No. 2:22-cv-01621-LK

DECLARATION OF ALEX HAGEL

I, Alex Hagel, declare as follows:

1. I am over the age of eighteen and competent to testify to the matters set forth herein.

I make this declaration based on personal knowledge.

2. I am an attorney at Cedar Law PLLC, representing N.D. and E.A. in this action. I am also the attorney of record in E.A.'s recently filed due process hearing request.

3. On July 25, 2023, Lara Hruska and I had a phone conversation with Lynette Baisch, the attorney representing the Selah School District in the due process hearing request. During that conversation, the parties discussed the impact "stay put" would have on E.A.'s graduation status and age-out status.

4. After the phone call, I sent a confirmatory email to Ms. Baisch outlining my understanding of the phone call. Ms. Baisch responded the following day. A true and complete copy of that email exchange is attached to this declaration as **EXHIBIT A**.

